

REMARKS

Applicant acknowledges the Examiner's withdrawal of the rejections of record in the July 30, 2003 Office Action.

Applicant notes that an Information Disclosure Statement was filed on January 23, 2004, and requests that the Examiner return an initialed PTO-1449 form with the next Action.

Status of the Application

Claims 1-54 are all the claims pending in the Application, as claims 40-54 are hereby added. Claims 1-39 have been rejected.

Anticipation Rejection

The Examiner has rejected claims 1-4, 7, 8, 10, 11-14, 17, 18, 20, 21-24, 27, 28 and 30-39 under 35 U.S.C. § 102(e) as being anticipated by *Jamtgaard et al.* (US 6,430,624 B1; hereinafter "*Jamtgaard*"). This rejection is respectfully traversed.

The instant Application is directed, *inter alia*, to a system wherein a document is parsed to generate a Document Object Model ("DOM"), a transformation instruction directed to a first object of the DOM is obtained, and the first object is transformed by changing the value thereof in accordance with the transformation instruction.

In contrast, *Jamtgaard* discloses converting a HTML document to an XML document and thereby creating a DOM (col. 9, lines 49-56). Then, the XML file DOM is converted into a RML file (col. 10, lines 49-52).

Regarding independent claims 1, 11 and 21, the Examiner alleges that *Jamtgaard* discloses that "transformation instructions are obtained that correspond to a document URL that

dictate how to convert the HTML file (beginning with the first object) into relational markup language, and the conversion (transformation) is performed” (O.A., pg. 3).

Thus, the Examiner seems to be taking the position that the conversion of an HTML file into RML somehow discloses the ability to “transform” an object as recited in claims 1, 11 and 21.

However, Applicant respectfully submits that *Jamtgaard* only discloses the ability to modify a file from one file type (e.g., HTML) to another file type (e.g., RML) in order to rearrange various portions of an HTML file to display parts of the file on, for example, a mobile device.

Jamtgaard fails to teach or suggest any particular ability to modify the underlying value of any particular object, and therefore fails to teach or suggest an ability to transform a “first object to change a value thereof in accordance with the transformation instruction,” as recited in the independent claims.

An illustrative, non-limiting, example of the claimed transformation is shown by the replacement of the “value” variables in FIG. 8 of the Application by the values shown in FIG. 14.

Thus, Applicant respectfully submits that independent claims 1, 11 and 21 are patentable over the applied reference. Further, Applicant respectfully submits that rejected dependent claims 2-10, 12-20 and 22-39 are allowable, *at least* by virtue of their dependency.

Thus, Applicants respectfully request that the Examiner withdraw this rejection.

Obviousness Rejection

The Examiner has rejected, under 35 U.S.C. § 103(a): (1) claims 5, 15 and 25 as being unpatentable over *Jamtgaard* in view of *Maslov* (US 6,538,673; hereinafter “*Maslov*”); (2) claims 6, 16 and 26 as being unpatentable over *Jamtgaard* in view of *Tadakoro et al.* (US 6,463,352; hereinafter “*Tadakoro*”); and (3) claims 9, 19 and 29 as being unpatentable over *Jamtgaard* in view of *Meltzer et al.* (US 6,542,912; hereinafter “*Meltzer*”). These rejections are respectfully traversed.

Applicant respectfully submits that none of the secondary references - *Maslov*, *Tadakoro* or *Meltzer* - teach or suggest the features missing from *Jamtgaard* discussed above.

Accordingly, it is respectfully submitted that rejected dependent claims 5, 6, 9, 15, 16, 19, 25, 26 and 29 are allowable, at least by virtue of their dependency.

Thus, Applicants respectfully request that the Examiner withdraw these rejections.

New Claims

Claims 40-54 are hereby added. Claims 40-54 are fully supported *at least* by pages 17-22 of the instant Application. Claims 40-54 are respectfully submitted to be allowable *at least* by virtue of their dependency.

Conclusion

In view of the foregoing, it is respectfully submitted that claims 1-51 are allowable. Thus, it is respectfully submitted that the application now is in condition for allowance with all of the claims 1-51.

Draft Amendment Under 37 C.F.R. § 1.111
U.S. Appln. No.: 09/512,738

Attorney Docket # A8642 /
ST9-99-151

If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

Please charge any fees which may be required to maintain the pendency of this application, except for the Issue Fee, to our Deposit Account No. 19-4880.

Respectfully submitted,



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